

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ARLIN M. ADAMS, Chapter 11 Trustee of
the Post-Confirmation Bankruptcy Estates of
CORAM HEALTHCARE CORPORATION,
a Delaware Corporation, and of CORAM
INC., a Delaware Corporation,

Plaintiff,

v.

DANIEL D. CROWLEY, DONALD J.
AMARAL, WILLIAM J. CASEY, L. PETER
SMITH, AND SANDRA L. SMOLEY,

Defendants.

Case No. 04-1565 (SLR)

NOTICE OF DEPOSITION SUBPOENA TO SAM ZELL

PLEASE TAKE NOTICE that, pursuant to Rule 45 of the Federal Rules of Civil Procedure, Defendant Daniel Crowley (“Crowley”), by his attorneys, will take the deposition of **Sam Zell** (“Zell”) at the offices of at the offices of Stetler & Duffy, 11 South LaSalle Street, Chicago, IL 60603, commencing at **9:00 a.m. on March 20, 2007**, and continuing from day to day, excluding Saturdays and Sundays, until concluded.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 30(b)(2) of the Federal Rules of Civil Procedure, the deposition will be taken before a notary public or other officer authorized by the law to administer oaths, and may be recorded both stenographically and by sound-and-visual means (i.e., by videotape), and provision may be made for real-time monitoring using LiveNotetm or similar means. Crowley reserves the right to use this videotape deposition at the time of trial.

Dated: March 7, 2007

CONNOLLY BOVE LODGE & HUTZ LLP

/s/ Christina M. Thompson

Jeffrey C. Wisler (#2795)

Christina M. Thompson (#3976)

1007 North Orange Street

P.O. Box 2207

Wilmington, DE 19899

(302) 888-6258

Email: jwisler@cblh.com

Email: cthompson@cblh.com

-and-

Elliot R. Peters

Garrett A. Lynch

Keker & Van Nest, LLP

710 Sansome Street

San Francisco, CA 94111

(415) 391-5400

Email: epeters@kvn.com

Email: glynch@kvn.com

Attorneys for *Defendant Daniel D. Crowley*

#525723